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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 Kela Grigoryan,

13 Plaintiff,

14 v.

15  
16 Equifax Information Services LLC;  
17 Experian Information Solutions, Inc.;  
18 Trans Union LLC; Clarity Services,  
19 Inc.; CollectTech; National Credit  
20 Systems, Inc.; Property Receivables,  
LLC,

21 Defendants.  
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Case No.: 2:24-cv-01913

**Discovery Plan and Scheduling  
Order Submitted in Compliance  
with LR 26-1(b)**

On April 21, 2025, Equifax Information Services LLC appeared in this case and the Court set a deadline to file a proposed discovery plan and scheduling order by June 5, 2025. Accordingly, Kela Grigoryan, National Credit Systems, Inc. and Property Receivables, Corp. (collectively as the “Parties”), by and through their respective counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties will require 180 days<sup>1</sup> of discovery measured from the date that Equifax Information Services LLC filed its answer to Plaintiff's complaint.

### DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

- |   |                    |
|---|--------------------|
| 1. Initial disclosures .....            | June 20, 2025      |
| 2. Amend pleadings and add parties ..   | July 21, 2025      |
| 3. Expert disclosures (initial): .....  | August 19, 2025    |
| 4. Expert disclosures (rebuttal): ..... | September 18, 2025 |
| 5. Discovery cutoff date: .....         | October 20, 2025   |
| 6. Dispositive motions: .....           | November 17, 2025  |
| 7. Pretrial order .....                 | December 17, 2025  |

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until **30 days after** decision on the dispositive motions or until further order of the court.

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<sup>1</sup> While the parties presently request a 180-day track for discovery, it is important to note that at least three defendants have not yet appeared in the action. Once those defendants appear, the parties anticipate that the Court will need to extend the above proposed deadlines.

1        Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any  
2 objections thereto, shall be included in the joint pretrial order.

3        Extensions or Modifications of the Discovery Plan and Scheduling Order:  
4 Applications to extend any date set by the discovery plan, scheduling order, or other  
5 order must comply with the Local Rules.

6        Protective Order: The parties may seek to enter a stipulated protective order  
7 pursuant to Rule 26(c) prior to producing any confidential documents.

8        Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and  
9 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be  
10 served by sending such documents by email.

11        Alternative Dispute Resolution Certification: The parties certify that they met  
12 and conferred about the possibility of using alternative dispute-resolution processes  
13 including mediation, arbitration, and early neutral evaluation. The parties have not  
14 reached any stipulations at this stage.

15        Alternative Forms of Case Disposition Certification: The parties certify that  
16 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and  
17 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).  
18 The parties have not reached any stipulations at this stage.

19        Electronically Stored Information: The parties have discussed the retention  
20 and production of electronic data. The parties agree that service of discovery by  
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1 electronic means, including sending original electronic files by email or on a cd is  
 2 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

3 Electronic evidence conference certification: The parties further intend to  
 4 present evidence in electronic format to jurors for the purposes of jury deliberations  
 5 at trial. The parties discussed the presentation of evidence for juror deliberations but  
 6 did not reach any stipulations as to the method as this early stage.  
 7

8 Dated: June 5, 2025.  
 9

10 **FREEDOM LAW FIRM**

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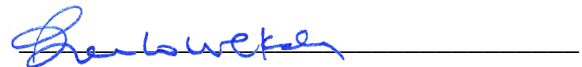
Las Vegas, NV 89123

*Counsel for Property Receivables, Corp.*

**SCHEDULING ORDER**

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 6/9/2025